

USDC SDNY
DOCUMENT
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DATE FILED: FEB 22 2018

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ROBBIE BLACK,
WIDOLPH BRUMAIRE,
DARREN THOMAS,
SIERRA CAMERON,
SIRE GAYE,
PIERRE SCHNEIDER, and
ANTHONY CASTILLO,

Defendants.

INDICTMENT

18 Cr.

18 CRM 153

Judge McMahon

COUNT ONE

(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

1. From at least in or about August 2017 up to and including at least in or about November 2017, in the Southern District of New York and elsewhere, ROBBIE BLACK, WIDOLPH BRUMAIRE, DARREN THOMAS, SIERRA CAMERON, SIRE GAYE, PIERRE SCHNEIDER, and ANTHONY CASTILLO, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and object of the conspiracy that ROBBIE BLACK, WIDOLPH BRUMAIRE, DARREN THOMAS, SIERRA CAMERON, SIRE

GAYE, PIERRE SCHNEIDER, and ANTHONY CASTILLO, the defendants, and others known and unknown, willfully and knowingly, would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO

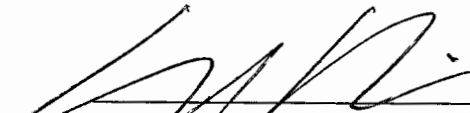
(Aggravated Identity Theft)

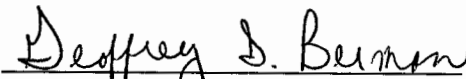
The Grand Jury further charges:

3. From at least in or about August 2017 up to and including at least in or about November 2017, in the Southern District of New York and elsewhere, ROBBIE BLACK, WIDOLPH BRUMAIRE, DARREN THOMAS, SIERRA CAMERON, SIRE GAYE, PIERRE SCHNEIDER, and ANTHONY CASTILLO, the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, BLACK, BRUMAIRE, THOMAS, CAMERON, GAYE, SCHNEIDER, and CASTILLO possessed and used the names and

bank account numbers of multiple persons for the purpose of furthering fraudulent withdrawals through these persons' bank accounts, during and in relation to the offense charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1),
1028A(b), and 2.)


FOREPERSON *2/22/18*


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

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PIERRE SCHNEIDER, and
ANTHONY CASTILLO,

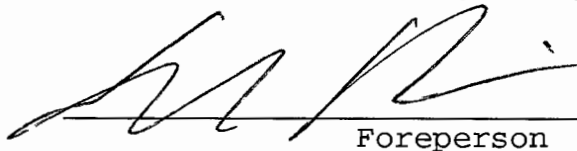
Defendants.

INDICTMENT

18 Cr.

(18 U.S.C. §§ 1349, 1028A(a)(1),
1028A(b), and 2.)

GEOFFREY S. BERMAN
United States Attorney



Foreperson

2/22/18

2/22/18 Filed Indictment. Assigned to J. McManus

Copy, USMJ